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30 UNITED STATES DISTRICT COURT
31 DISTRICT OF NEVADA

32 DIAMOND RESORTS U.S. COLLECTION
33 DEVELOPMENT, LLC, a Delaware Limited
34 Liability Company,

35 Case No.: 2:17-cv-03007-APG-VCF

36 Plaintiff,

37 v.

38 REED HEIN & ASSOCIATES, LLC d/b/a
39 TIMESHARE EXIT TEAM, a Washington
40 Limited Liability Company; BRANDON
41 REED, an individual and citizen of the State of
42 Washington; TREVOR HEIN, an individual
43 and citizen of Canada; THOMAS

44 **STIPULATION AND [PROPOSED]
45 ORDER TO EXTEND DEADLINE TO
46 RESPOND TO SGB'S MOTION TO
47 DISMISS [ECF #204]**

48 **[First Request]**

PARENTEAU, an individual and citizen of the State of Washington; HAPPY HOUR MEDIA GROUP, LLC, a Washington Limited Liability Company; MITCHELL R. SUSSMAN, ESQ. d/b/a THE LAW OFFICES OF MITCHELL REED SUSSMAN & ASSOCIATES, an individual and citizen of the State of California; SCHROETER, GOLDMARK & BENDER, P.S., a Washington Professional Services Corporation; and KEN B. PRIVETT, ESQ., a citizen of the State of Oklahoma.

Defendants.

Pursuant to LR IA 6-1 and Fed. R. Civ. P. 6(b)(1)(A) (“FRCP”), Plaintiff Diamond Resorts U.S. Collection Development, LLC (“Plaintiff”), and Defendant Schroeter, Goldmark & Bender, P.S. (“SGB”), hereby stipulate to extend Plaintiff’s deadline to file a response to SGB’s Special Motion to Dismiss Pursuant to NRS 41.660 [ECF #204]¹ (the “Motion”), currently set for May 15, 2020, until May 29, 2020, and as grounds state as follows:

1. On May 1, 2020, SGB filed the subject Motion.

2. Since SGB filed the Motion, both Plaintiff and SGB have been required to respond to voluminous discovery requests (with current deadlines of May 14 and 15, 2020) and respond to various motions filed in this case. *See, e.g.*, Plaintiff's Responses to SGB's Motion for Protective Order, [ECF #216], and Reed Hein's Motion to Compel [ECF #214], and SGB's response to Diamond's Motion to Exceed the Deposition Limit [ECF #215], all filed on May 8, 2020.

3. Additionally, as part of responding to discovery, and after the Motion was filed, Plaintiff produced approximately 30,000 pages of owner documents on May 1, 2020, and an additional 35,000 pages of documents on May 8, 2020.

4. Further, during the next two weeks, Diamond will be required to respond to the oppositions filed by SGB, and presumably the other Defendants with regard to Diamond's Motion to Exceed the Deposition Limit.

¹ The Motion was originally filed as ECF #202, but a corrected image was filed as ECF #204.

1 5. Concurrently, Plaintiff has been diligently working to respond to the Motion.

2 6. Due to the importance of the Motion, the additional time necessary to review and
3 produce documents (some of which may be relevant to responding to the Motion), and the
4 additional time needed to draft the responses outlined above, Plaintiff is unable to file a response
5 to SGB's Motion prior to the current deadline of May 15, 2020.

6 7. As a result, Plaintiff and SGB have agreed to extend Plaintiff's response deadline
7 by two (2) weeks, until May 29, 2020.

8 8. This stipulation is not made for purposes of delay.

9 Dated this 13th day of May, 2020

10 GREENSPOON MARDER, LLP

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18 *Attorneys for Defendant*
19 *Schroeter, Goldmark & Bender, P.S.*

20 IT IS SO ORDERED

21 
22 _____
23 UNITED STATES DISTRICT JUDGE

24 5/13/2020
25 DATED: _____

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